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Sanford Rader – In Memoriam
1960-2018

November 21, 2023

VIA E-File Only

The Honorable Leda Dunn Wettre, U.S.M.J.
United States District Court
Martin Luther King Federal Courthouse & Building
50 Walnut Street
Newark, New Jersey 07102

SO ORDERED.

s/ Leda Dunn Wettre, U.S.M.J.

Dated: 11/22/2023

RE: Nijeer Parks v. Township of Woodbridge, et al.,
Civil Action No: 2:21-cv-04021-MCA-LDW

Your Honor:

As Your Honor is aware, this office represents the interests of Woodbridge Township Mayor John E. McCormac, Woodbridge Police Department Director Robert Hubner, Township of Woodbridge, Woodbridge Police Officer Andrew Lyszyk and Woodbridge Police Sergeant Joseph Licciardi (collectively herein, "Woodbridge Defendants") with respect to the above-referenced matter. The deadline for the filing of Defendants' Motion for Summary Judgment is November 22, 2023. The Woodbridge Defendants respectfully request the deadline for filing of the Motion for Summary Judgment be extended one-week to November 29, 2023. Counsel for Plaintiff has consented to this request. In light of the following, the Parties propose the following briefing schedule:

- Defendants' Motion for Summary Judgment filed by December 5, 2023;
- Plaintiff's Opposition to Motion for Summary Judgment filed by December 22, 2023;
- Defendants Reply to Plaintiff's Opposition filed by December 29, 2023;
- Motion for Summary Judgment returnable on January 2, 2024.

Thank you for Your Honor's kind attention to this matter.

Respectfully submitted,

/s/ Garry J. Clemente, Esq.

Cc: All counsel via electronic filing and email.

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